

THE CITY OFFICE OF
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February 7, 2006

Jeffrey A. Dougherty, Esq.
Assistant Corporation Counsel
NYC Law Department
100 Church St., Rm. 3-135
New York, NY 10007

CITY OF N.Y. LAW DEPT.
OFFICE OF CORP. COUNSEL
COMMUNICATIONS SECTION
2006 FEB 8 AM 10 26

Re: Abdell, et al. v. City of New York, et al.
05 Civ. 8453 (KMK)(JCF)

Dear Mr. Dougherty:

I write in response to your January 27, 2006, email and to supplement Plaintiff Ed Hedemann's Responses to Defendants' First Set of Interrogatories and Request for Production of Documents to Plaintiff Ed Hedemann. I am also enclosing a Verification of plaintiff Hedemann's responses to the interrogatories, as supplemented by the responses herein.

Supplementary Response to Interrogatory No. 4: Plaintiff sustained no physical or psychological injury as a result of the incident, but did experience physical discomfort and emotional distress.

Supplementary Response to Interrogatory No. 7: Notwithstanding and without waiving or in any way limiting the objections to this interrogatory or the general objections, plaintiff has received no psychological treatment within the last ten years.

Supplementary Response to Interrogatory No. 13: Notwithstanding and without waiving or in any way limiting the objections to this interrogatory or the general objections, plaintiff Hedemann has been arrested on the following occasions (other than the incident complained of herein) within the last ten years:

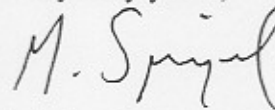
6/28/95 in Washington, DC, he was not convicted and was not incarcerated;
10/19/98 in Arlington, VA, he was convicted and was incarcerated for two days;
3/26/99 in New York, NY, he was not convicted and was not incarcerated;
6/3/99 in New York, NY, he was not convicted and was not incarcerated;
3/19/05 in Brooklyn, NY, he was not convicted and was not incarcerated.

Supplementary Response to Interrogatory No. 14: See response to Interrogatory No. 13.

Supplementary Response to Interrogatory No. 19: Plaintiff supplements his response by reference to enclosed photographs Bates numbered 18-45.

The enclosed photographs also supplement plaintiff's responses to Document Request Nos. 1 and 4.

Very truly yours,

A handwritten signature in black ink, appearing to read "M. Spiegel". The signature is fluid and cursive, with the first letter "M" being large and prominent.

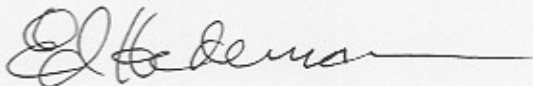
Michael L. Spiegel

MLS:ms
Enc.

VERIFICATION:

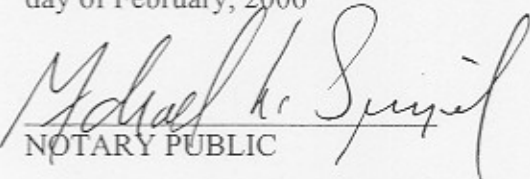
State of New York)
) ss:
County of New York)

I, Ed Hedemann, being duly sworn, depose and say that deponent is a plaintiff in Abdell, et al. v. City of New York, et al., 05 Civ. 8453 (KMK)(JCF); that deponent has read the foregoing interrogatory responses in Plaintiff Ed Hedemann's Responses to Defendants' First Set of Interrogatories and Request for Production of Documents to Plaintiff Ed Hedemann, as supplemented by the letter of Michael L. Spiegel dated February 7, 2006, and knows the contents thereof, and that the same is true to deponent's own knowledge, except as to the matters therein stated to be alleged upon information and belief, and as to those matters deponent believes them to be true.



Ed Hedemann

Sworn to before me this 7th
day of February, 2006


NOTARY PUBLIC

MICHAEL L. SPIEGEL
Notary Public, State of New York
No. 31-5072155
Qualified in New York County
Commission Expires Jan. 27, 2007